

November 25, 2020

RECEIVED

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Air & Radiation Division

Cristina Fernandez
Director – Air and Radiation Division
U.S. EPA Region 3
1650 Arch Street
Philadelphia, PA 19103-2029

**RE: Standards of Performance for New Stationary Sources – Notification of Construction
40 CFR Part 60, Subpart Dc
B. Braun Medical, Inc.
State Only Operating Permit No. 39-00055**

Dear Ms. Fernandez:

In accordance with 40 CFR §60.48c(a) and Condition No. #004 and #014 of Pennsylvania Department of Environmental Protection (PADEP) Plan Approval No. 39-00055A, B. Braun Medical, Inc. (B. Braun) is submitting this notification of construction for sources subject to the Standards of Performance for New Stationary Sources: Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR Part 60, Subpart Dc). The notification requirements of 40 CFR Part 60, Subpart Dc are applicable to small industrial-commercial-institutional steam generating units as defined in 40 CFR §60.41c.

In accordance with 40 CFR §60.7(a)(1), the notification of the date of construction for affected facilities must be submitted to the Administrator no later than 30 days after such date. Two natural gas-fired boilers (Emission Unit IDs 033 and 034 authorized under Plan Approval No. 39-00055A) are expected to be brought onsite in December 2020 and to start up in the second quarter of 2021. The information specified in 40 CFR §60.48c(a)(1)-(4) to be included in the notification of construction is presented below in *italic font*, followed by B. Braun's response in **bold font**:

(1) The design heat input capacity of the affected facility and identification of fuels to be combusted in the affected facility.

The affected facilities are two natural gas-fired boilers, each rated 21.0 million British Thermal Units (MMBtu) per hour (MMBtu/hr).

(2) If applicable, a copy of any federally enforceable requirement that limits the annual capacity factor for any fuel or mixture of fuels under §60.42c, or §60.43c.

Not applicable – the boilers are not subject to an annual capacity factor limit.

(3) The annual capacity factor at which the owner or operator anticipates operating the affected facility based on all fuels fired and based on each individual fuel fired.

“Annual capacity factor” for steam generating units that are not rented or leased is defined under 40 CFR §60.41c as “the ratio between the actual heat input to a steam generating unit from an individual fuel or combination of fuels during a period of 12 consecutive calendar months and the potential heat input to the steam generating unit from all fuels had the steam generating unit been operated for 8,760 hours during that 12-month period at the maximum design heat input capacity.”

Each boiler is permitted to fire only natural gas with an annual capacity factor of 100%.

(4) Notification if an emerging technology will be used for controlling SO₂ emissions. The Administrator will examine the description of the control device and will determine whether the technology qualifies as an emerging technology. In making this determination, the Administrator may require the owner or operator of the affected facility to submit additional information concerning the control device. The affected facility is subject to the provisions of §60.42c(a) or (b)(1), unless and until this determination is made by the Administrator.

Not applicable – the boilers are only permitted to fire natural gas and therefore are not subject to an SO₂ emissions limit.

Please contact me at (610) 596-2474 or eric.geder@bbraunusa.com should you have any questions regarding this submittal.

Sincerely,

B. Braun Medical Inc.



Eric Geder, CSP
EHS&S Manager

cc: Mr. Shailesh Patel – PADEP
Associate Director – Office of Air Enforcement and Compliance, 3AP20
Christina Lynch, P.E. – ALL4 LLC

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